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3 District of Nevada
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12
13 **UNITED STATES DISTRICT COURT**
14 **IN AND FOR THE DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,)
16)
17 Plaintiff,)
18)
19 v.)
20)
21 JORGE IVAN ALVAREZ,)
22)
23 Defendant.)
24)
25)
26)
27)
28)

Case No.: 2:23-mj-0806-DJA

STIPULATION TO CLOSE CASE

16 IT IS STIPULATED AND AGREED, by and between JASON M. FRIERSON,
17 United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the
18 United States of America, and Nicholas Wooldridge, Esquire, counsel for the defendant Jorge
19 Alvarez, that the above-captioned matter be closed.

20 This Stipulation is entered into based upon the following:

21 1. On or about March 20, 2024, defendant entered into a Petty Offense
22 Agreement with the United States in which he agreed to plead guilty to Count One of the
23 Complaint, Operating a Motor Vehicle while Under the Influence of Alcohol and Drugs, in
24 violation of 36 C.F.R. § 4.23(a)(1). *See* ECF No. 9.

25 2. The parties agreed to recommend that defendant be sentenced to one year of
26 unsupervised probation with the following special conditions: (i) pay a \$500.00 fine and a

1 mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court Counseling's (1)
2 DUI course and (2) Victim Impact Panel; (iii) complete an eight (8) hour online alcohol
3 awareness course; (iv) not return to Lake Mead National Recreation Area for a period of six
4 (6) months; and (v) not violate any local, state, or federal laws for a period of six (6) months.

5 If the defendant successfully completes his obligations within six months of unsupervised
6 probation, the court will allow the defendant to withdraw his guilty plea to count one and the
7 government will move to amend count one to reckless driving.
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9 3. On March 20, 2024, this Court sentenced defendant pursuant to the parties'
10 plea agreement. *See* ECF No. 9.

11 4. Since commencing her term of unsupervised probation, defendant has
12 successfully completed conditions (i), (ii), (iii), and (iv).

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5. As such, the parties jointly request that the defendant be allowed to withdraw his guilty plea to count one and the government moves to amend count one to reckless driving. The parties also jointly request that the above-captioned matter be closed.

DATED this 10th day of October, 2024.

Respectfully submitted,

JASON M. FRIERSON
United States Attorney

/s/ *Nicholas Wooldridge*
NICHOLAS WOOLDRIDGE, ESQ.
Attorney for Defendant
JORGE IVAN ALVAREZ

/s/ Skyler Pearson
SKYLER PEARSON
Assistant United States Attorney

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
)
Plaintiff,
)
vs.
)
JORGE IVAN ALVAREZ,
)
Defendant.
)

Case No.: 2:23-mj-0806-DJA

ORDER TO CLOSE THE CASE

JORGE IVAN ALVAREZ,
Defendant.

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defendant Jorge Ivan Alvarez has successfully completed the conditions of his sentencing.

ORDER

IT IS HEREBY ORDERED that the defendant is allowed to withdraw his guilty plea to count one and that the count one be amended to reckless driving.

IT IS HEREBY ORDERED that the parties move the Court in the above-captioned matter case be closed, as all requirements have been completed.

DATED this 11th day of October, 2024

UNITED STATES MAGISTRATE JUDGE